

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

CASE NO: 0:22-cv-61471-WPD

ANDREA GRAJEDA, on behalf of herself
and all others similarly situated,

Plaintiff,
v.

VERIFIED MOVING PROS, LLC, and
DONALD LINA, individually,

Defendants.

_____ /

JOINT MOTION FOR APPROVAL OF ENTRY OF CONSENT JUDGMENT

Opt-in Plaintiffs, ALEXANDERA JORDAN, LONG TRANG, and DONOVAN LEONARD (“Opt-in Plaintiffs”) and Defendants, VERIFIED MOVING PROS, LLC and DONALD LINA (“Defendants”) (Opt-in Plaintiffs and Defendants collectively referred to herein as “Parties”) hereby file this Joint Motion for Approval of Entry of Consent Judgment and in support thereof states as follows:

1. On September 22, 2023, the Court granted summary judgment for Plaintiffs, ANDREA GRAJEDA, BRYAN ROBERT, NICHOLAS DE FREITAS, JAVIER A. PAULINA-PENA, CHRISTINA BIANCA-FAUSTIN and AMBER ASHLEY LEE. The Court found that Defendants, jointly and severally, violated the FLSA and awarded these Plaintiffs their full unpaid wages and liquidated damages [D.E. 72].

2. The summary judgment ordered stated the only remaining issue for trial was the damages amount as to Opt-in Plaintiffs.

3. Rather than proceed with trial, Defendants have agreed to enter into a Consent Judgment for Opt-in Plaintiffs full unpaid wages and liquidated damages.

4. The stipulated amount owed to Opt-in Plaintiffs is as follows:

NAME	NUMBER OF WEEKS WORKED	OVERTIME HOURS WORKED	REGULAR HOURLY RATE (Total Compensation divided by Hours Worked)	HALF-TIME RATE	OVERTIME OWED	OVERTIME OWED WITH LIQUIDATED DAMAGES
Alexandrea Jordan	14 Weeks	15 hours	\$12.73	\$6.37	\$1,337.70	\$2,675.40
Donovan Leonard	17 Weeks	15 hours	\$13.63	\$6.82	\$1,739.10	\$3,478.20
Long Trang	9 Weeks	8 hours	\$15.62	\$7.81	\$562.32	\$1,124.64

5. The Parties stipulate that the Opt-in Plaintiffs are prevailing parties for the purposes of the Court awarding fees and costs pursuant to 29 U.S.C. § 216(b).

6. The Parties stipulate in the proposed Consent Judgment that Opt-in Plaintiffs will comply with the Southern District of Florida's Local Rules governing the adjudication of attorney's fees and costs.

7. The Parties stipulate that the Court will retain jurisdiction to adjudicate the issue of attorney's fees and costs for ninety (90) days.

8. After the entry of the Consent Judgment, the Plaintiffs, ANDREA GRAJEDA, BRYAN ROBERT, NICHOLAS DE FREITAS, JAVIER A. PAULINA-PENA, CHRISTINA BIANCA-FAUSTIN and AMBER ASHLEY LEE, intend to file a Motion for Entry of Final Summary Judgment consistent with the Court's summary judgment order [D.E. 72].

WHEREFORE, the said Parties respectfully request that the Court enter the attached Stipulated Consent Judgment as to Defendants, VERIFIED MOVING PROS, LLC and

DONALD LINA, jointly and severally; (2) retaining jurisdiction to adjudicate the matter of attorney's fees; and (3) awarding any such further relief the Court deems just and proper.

Dated: October 4, 2023

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document was filed via CM/ECF on October 4, 2023.

By: /s/ Michael V. Miller
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